

Publication of Summary and Analysis of Data from Wisconsin's ACF 812 Report for March 2011

Executive Summary

Wisconsin's work participation rate for March 2011 was 38%. The sample drawn for the ACF 812 report had a work participation rate of 30%. Despite the discrepancy, the data from the ACF 812 report provides insight into the high level of engagement of Wisconsin Works (W-2) participants.

Our analysis shows that of the cases that are not already meeting the work participation rate or disregarded from the rate (note that individuals may be reported in more than one category listed below):

- Wisconsin is engaging 98% of the work eligible individuals;
- These engaged work eligible individuals are participating in:
 - activities the state chose not to report (59%);
 - activities that have insufficient hours to meet the requirements (43%); and
 - activities that are currently non-countable for federal work participation rates (39%);
- Wisconsin is collecting all of the needed verification to document participation in assigned activities.

Background

The Claims Resolution Act of 2010 reauthorized funding of the Temporary Assistance for Needy Families (TANF) program through September 30, 2011. The Act also established new state reporting requirements, under Section 812.

Section 812 requires each State to submit a "Report on Engagement in Additional Work Activities". The report must be submitted for two reporting periods. The first reporting period is from March 1, 2011 through March 31, 2011 due no later than May 31, 2011. The second reporting period is from April 1, 2011 through June 30, 2011 due no later than August 31, 2011.

In addition, each State must publish to its website the following information:

- A. a summary of the information submitted in the ACF 812 report
- B. an analysis statement comparing the data submitted in the ACF 812 report to the data submitted in the State's quarterly work participation rate report; and
- C. a narrative describing the most common activities contained in the report that are not countable toward the State work participation rates under section 407 of the Social Security Act.

This publication includes all three items. In addition, we have added a section at the end which provides background on the federal work participation rate requirements.

Part A – Summary of Information Submitted in the Report to ACF

States had the option of reporting on their full TANF caseload or selecting a random sample. Wisconsin selected a random sample of 350 cases which included 428 work-eligible individuals.

For the period beginning March 1, 2011 and ending March 31, 2011, 85 of the 428 work-eligible individuals in the report sample participated in countable work activities for a sufficient number of hours for the family to count toward the work participation rate (WPR).

343 individuals in the sample did not have sufficient number of hours for the family to count toward the work participation rate. See Table 1 below for detail on the types of activities in which these individuals participated. Note that individuals may be reported in more than one category listed on the table.

Table 1: ACF 812 Data for Individuals Not Meeting WPR

	Number	%
Total Number of Individuals	343	100%
Description: Total individuals who did not have sufficient number of hours for the family to count toward the work participation rate.		
9.* State Chose Not to Report [Voc Ed and Job Search]	205	59.8%
Description: Total individuals who participated in a work activity that could count towards the work participation rate, but the State chose not to report such hours of participation in the quarterly TANF/SSP MOE Data Report because the family did not need the individual's hours of participation to meet the work requirements to count toward the work participation rate (or the hours were not sufficient to help the individual meet the work participation rate).		
Note: There are two Countable Work Activities that Wisconsin elects not to report when the hours are either not needed or not sufficient to help the individual meet the work participation rate. These are <i>Vocational Educational Training</i> and <i>Job Search and Job Readiness</i> .		
10. Insufficient Hours [All except Voc Ed and Job Search]	144	42.0%
Description: Total individuals who participated in a Countable Work Activity that did not count toward the work participation rate, because the work-eligible individual was engaged for insufficient hours to meet the work requirements for counting towards the work participation rates.		
Note: There are five Countable Work Activities that Wisconsin reports regardless of whether or not an individual will meet the work participation rate in a given month. These are: <ul style="list-style-type: none"> • <i>Unsubsidized Employment</i> • <i>Community Work Experience</i> • <i>Job Skills Training Directly related to Employment</i> • <i>Education Directly Related to Employment</i> • <i>Satisfactory School Attendance</i> 		
11. Beyond Statutory Limits	0	0.0%
Description: Total individuals who participated in a countable work activity that did not count toward the work participation rates because the hours of participation in the activity are beyond statutory limit for reporting the hours of participation as countable work activities.		

	Number	%
Note: Two Work Activities, <i>Job Search and Job Readiness</i> and <i>Vocational Educational Training</i> have limits pertaining to the amount of time the activity may be counted towards an individual's work participation. However, there were no individuals in the sample that had reached their statutory limit for either activity.		
12. Did Not Meet Federal Verification Standards	0	0.0%
Description: Total individuals who participated in a Countable Work Activity, but the state did not report such hours of participation in the TANF/SSP MOE Data Report because the State could not meet the Federal verification standards for including the hours of participation in the report.		
13. Non-Countable Activities	136	39.6%
Description: Total individuals who participated in activities that do not qualify as a countable work activity under Section 407 (d) of the Social Security Act. The activities are considered to be moving the family toward self-sufficiency.		
Note: Wisconsin reported having individuals in the following federal categories of non-countable activities (See Part C for more detail): <ul style="list-style-type: none"> • <i>Treatment Activities</i> • <i>Family Life Skills</i> • <i>Accessing Work Support Activities</i> <i>Other Activities</i>		
14. No Activities	36	10.5%
Description: Total individuals who participated in no countable or non-countable work activities. Subtotals are below:		
<i>Total individuals who were assigned to a work activity that had not yet begun.</i>	<i>1</i>	<i>0.3%</i>
<i>Total individuals who had not been engaged by the local agency (or its contractor).</i>	<i>3</i>	<i>0.8%</i>
<i>Total individuals who were in the process of relocating from one local agency with the state to another.</i>	<i>4</i>	<i>1.0%</i>
<ul style="list-style-type: none"> • <i>Total individuals who were disregarded from the work participation rate for reasons which may include:</i> <ul style="list-style-type: none"> ▪ <i>single custodial parent with child under age one;</i> ▪ <i>subject to a sanction for refusing to participate in work activities, but not subject to a sanction for more than 3 months in the preceding 12-month period.; or</i> <i>participating in a Tribal work program.</i>	15	4.4%
<i>Total individuals who were the second parent in a case that was not receiving federally funded child care. In these cases, the second parent is not required to participate.</i>	13	3.7%

*Numbers in table refer to response items in ACF 812 report.

Part B – Report Analysis

This section provides an analysis of the extent to which the data submitted in the ACF 812 report differs from the data submitted in the State's quarterly report submitted for the comparable period.

As shown in Table 3, the sample pulled for the ACF 812 report had a lower overall work participation rate than the cases reported in the State's quarterly report for March 2011. The sample pulled for the ACF 812 also had a disproportionate number of two-parent cases. Whereas the percentage of two-parent cases in the full caseload for March 2011 was 5%, the percentage of two-parent cases in the sample was 22%. The reason for this over sampling of two-parent case is that Wisconsin's separate state program (SSP) is used primarily for nonqualified aliens who are not eligible for TANF. These individuals are more likely than our general TANF population to be in two-parent cases.

Table 3: ACF 812 Data Compared to Quarterly Report Data for March 2011

	Sample used for ACF 812 Report		Full Caseload for March 2011	
	# of Cases	WPR	# of Cases	WPR
1-Parent	272	30.28%	3460	38.10%
2-Parent	78	30.16%	151	28.71%
All Family	350	30.25%	3611	37.59%

When comparing the ACF 812 data to the quarterly report data, it is important to note that the work participation rate is calculated based on whether a case met the required hours of participation. The data reported in ACF 812 is based on individual level data.

At first glance, the sample data appears to show a high rate of non-participation (i.e., only 85 of the 428 individuals in the sample met the WPR in the month of March). However, in further analyzing the data in the context of what is submitted for these individuals in the quarterly report, a more complete picture is formed.

A review of the 350 cases that were pulled for the March sample shows that 69 of the cases were disregarded from the work participation rate for reasons that may include:

- single custodial parent with child under age one;
- subject to a sanction for refusing to participate in work activities, but not subject to a sanction for more than 3 months in the preceding 12-month period.; or
- participating in a Tribal work program.

Of the remaining 281 cases ($350-69=281$), 85 cases (or 30.25%) met the work participation rate. To better understand the data, we focused on the 196 ($281-85=196$) cases in the sample that did not meet the work participation rate. We also broke out our analysis into single parent and two-parent cases. Of the 196 cases, 152 cases were single parent and 44 cases (88 individuals) were two parent.

This analysis shows that of the cases that are not already meeting the work participation rate or disregarded from the rate:

- Wisconsin is engaging all 98% of the work eligible individuals (16 total in no activities; however, 9 of these individuals are second parents in two-parent cases in which the second parent is not required to participate in activities because the family is not receiving child care);
- These engaged work eligible individuals are participating in:
 - activities the state chose not to report (59%);
 - activities that have insufficient hours to meet the requirements (43%); and
 - activities that are currently non-countable for federal work participation rates;
- Wisconsin is collecting all of the needed verification to document participation in assigned activities.

See Table 4 for details.

Table 4: ACF 812 Data for Individuals Not Disregarded and Not Meeting WPR Broken Out by Case Type

Totals	Number	%
Single Parent Family	152	100.0%
Two-Parent Family	88	100.0%
All Family	240	100.0%
9.* State Chose Not to Report [Voc Ed and Job Search]		
Single Parent Family	91	59.9%
Two-Parent Family	51	58.0%
All Family	142	59.2%
10. Insufficient Hours [All except Voc Ed and Job Search]		
Single Parent Family	53	34.9%
Two-Parent Family	49	55.7%
All Family	102	42.5%
11. Beyond Statutory Limits		
Single Parent Family	0	0.0%
Two-Parent Family	0	0.0%
All Family	0	0.0%
12. Did Not Meet Federal Verification Standards		
Single Parent Family	0	0.0%
Two-Parent Family	0	0.0%
All Family	0	0.0%
13. Non-Countable Activities		
Single Parent Family	96	63.2%
Two-Parent Family	13	14.8%
All Family	109	45.4%
14. No Activities		
Single Parent Family	5	3.3%
<ul style="list-style-type: none"> <i>Total individuals who were assigned to a work activity that had not yet begun.</i> 	1	.6%
<ul style="list-style-type: none"> <i>Total individuals who had not been engaged by the local agency (or its contractor).</i> 	1	.6%
<ul style="list-style-type: none"> <i>Total individuals who were in the process of relocating from one local agency with the state to another.</i> 	3	2.0%
Two-Parent Family	11	12.5%
<ul style="list-style-type: none"> <i>Total individuals who had not been engaged by the local agency (or its contractor).</i> 	1	1.1%
<ul style="list-style-type: none"> <i>Total individuals who were in the process of relocating from one local agency with the state to another.</i> 	1	1.1%
<ul style="list-style-type: none"> <i>Total individuals who were the second parent in a case that was not receiving federally funded child care. In these cases, the second parent is not required to participate.</i> 	9	10.2%
All Family	16	6.7%

*Numbers in table refer to response items in ACF 812 report.

Part C – Activities Reported to ACF that are Not Countable toward the State Work Participation Rate

136 individuals participated in activities that help move the family toward self-sufficiency but do not qualify as a countable work activity under Section 407 (d) of the Social Security Act. The following is a description of each non-countable activity that Wisconsin reported in item number 13 in Parts A and B.

Treatment Activities

Domestic Violence Assessment and Supportive Services: for a participant who is receiving services for domestic violence. This includes assessment and supportive services, such as counseling, temporary shelter, legal assistance, etc.

Ongoing Medical/Personal Care: Report this activity when a participant is involved in ongoing medical appointments or during timeframes when a participant cannot be assigned to other work activities due to medical restrictions that are expected to last more than six months. The medical restrictions and the expectation that the activity will last more than six months must be certified by a qualified medical or mental health professional.

Family Life Skills

Parenting Skills: Report this activity for participants who are engaged in activities that teach effective parenting skills. Activities may include:

- Parenting techniques
- Nutrition
- Family planning
- Behavior modification

Personal Development: Report this activity for participants who are engaged in activities that promote a healthier lifestyle but the activity has not been determined to be medically necessary. The activity must be assigned with the goal of moving the participant towards employment. These activities may include, but are not limited to:

- Personal journaling
- Motivational reading
- Exercise at home
- Smoking cessation
- Weight loss promotion
- Ongoing support groups for domestic violence, Alcoholics Anonymous, Narcotics Anonymous, etc.

Accessing Work Support Activities

Drivers Education: When a participant is enrolled in a course of study that includes both classroom and behind-the-wheel instruction designed to prepare the student to pass the Wisconsin Driver's License Examination. This activity may also be used to reflect those hours a participant attends classes in order to have a Driver's License reinstated.

Housing-Related Activities: For those participants experiencing a housing crisis and in need of stabilizing their living situation. This may include guided or self-directed housing search, relocating to get out of a domestic abuse situation and housing education sessions at community agencies.

Other

Family Member Treatment/Counseling: When a participant is attending appointments on a weekly basis for another W-2 group member's medical, AODA mental health needs, or other treatment/counseling

Court-Related/Legal Appointments: Activities where participant is scheduled for court-ordered appointments for self and/or children. This may include:

- child welfare home visits and Wrap-Around staffing sessions,
- child support hearings and legal meetings with attorneys,
- probation and parole appointments, and
- Huber-related activities.

Background on the Federal Work Participation Rate

When Congress created TANF in 1996, one of its goals was to ensure that families getting cash assistance received help in attaining self-sufficiency. Congress established the work participation rate as the tool to measure whether or not a state meets this goal. Each State must meet an overall work participation rate of 50% and a 90% work participation rate for two-parent families or be subject to a financial penalty. The work participation rate focuses on work eligible individuals and whether or not the WEI is engaged in specific work activities.

A work eligible individual is an adult recipient of TANF cash assistance unless the parent is:

- a non-citizen who is ineligible to receive assistance due to his or her immigration status;
- a Supplemental Security Income (SSI) recipient;
- a parent providing care for a disabled family member living in the home; or
- a parent receiving Social Security Disability Insurance (SSDI) benefits.

For a WEI to count towards the work participation rate, the individual must have verified participation in countable activities for a specific number of hours each month. Parents with children 6 years of age and older must participate in a countable activity for 30 hours per week for each week they are receiving a TANF benefit. Parents with children under 6 years old must participate for 20 hours. Families with two parents must participate an average of 35 hours per week.

Countable work activities are limited to:

- Unsubsidized Employment
- Subsidized Employment
- Community Work Experience
- Community Service
- On-the-Job Training
- Vocational Education/Training
- Job Search/Job Readiness

Note: Of the above Federal activities, Wisconsin only reports activities under Unsubsidized Employment, Community Work Experience, Vocational Educational/Training and Job Search/ Job Readiness.

WEIs with a 30 hour requirement must participate in the above activities for at least 20 hours and then also participate for 10 more hours in the above and/or:

- Job Skills Training Directly Related to Employment;
- Education Directly Related to Employment; and
- Satisfactory School Attendance

There are limits to how long an individual may be engaged in vocational education (twelve-month lifetime limit) and job search/job readiness training (limited to six weeks in a twelve-month period). Because Wisconsin meets the definition of needy state under 45 CFR § 260.30, the job search/job readiness limit increases to twelve weeks in a twelve-month period. There is an additional limit for job search: an

individual's participation in job search/job readiness does not count for a week that follows four consecutive weeks of job search/job readiness activities.

All other activities are considered non-countable.